AF/2175 #

PATENT

#19 5/7/04

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application No.	:	09/539,482
Applicant:	:	Kenneth R. James
Filed:	:	March 30, 2000
Title:	:	METHODS FOR EFFICIENT HOST PROCESSING OF DATA FILES SELECTED FOR RECORDING TO AN OPTICAL DISC MEDIA
TC/A.U.	:	2175
Examiner	:	Rones, Charles
Atty. Docket No.	:	ROXIP120
Date	:	April 26, 2004

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Appeal Brief Patents, Commissioner for Patents, P.O. Box 1450, Alexandria, VA, 22313-1450, on April 26, 2004

Signed: _____
Neely Jo Entwistle

TRANSMITTAL OF APPEAL BRIEF
(PATENT APPLICATION -- 37 CFR 192)

Commissioner for Patents
Mail Stop: Appeal Brief- Patents
Alexandria, VA 22313-1450

Sir:

This Appeal Brief is in furtherance of the Notice of Appeal filed in this case on February 23, 2004. The Notice of Appeal was received by the USPTO on February 27, 2004. Therefore, the due date for this Appeal Brief is April 27, 2004. This Appeal Brief is transmitted in triplicate:

This application is on behalf of:

☐ Small Entity ☒ Large Entity

Pursuant to 37 CFR 1.17(f), the fee for filing the Appeal Brief is:

☐ $165.00 (Small Entity) ☒ $330.00 (Large Entity)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136 apply:

☐ Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d)) for the total number of months checked below:

Months	Large Entity	Small Entity
☐ one	$110.00	$55.00
☐ two	$420.00	$210.00
☐ three	$950.00	$475.00

☐ If an additional extension of time is required, please consider this a petition therefor.

☐ An extension for __ months has already been secured and the fee paid therefor of $_____ is deducted from the total fee due for the total months of extension now requested.

☒ Applicant believes that no extension of term is required. However, this conditional petition is being made to provide for the possibility that Applicant has inadvertently overlooked the need for a petition and fee for extension of time.

Total Fees Due:

Notice of Appeal Fee	$330.00
Extension Fee (if any)	$_____
Total Fee Due	**$330.00**

☒ Enclosed is Check No. 10916 in the amount of $330.00.

☒ Charge any additional fees or credit any overpayment to Deposit Account No. 50-0850, (Order No. ROXIP120). Two copies of this transmittal are enclosed.

Respectfully submitted,
MARTINE & PENILLA, LLP

Rick von Wohld, Esq.
Reg. No. 48,018

710 Lakeway Drive, Suite 170
Sunnyvale, CA 94085
(408) 749-6900
Customer No. 25,920

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

EX PARTE JAMES

Application for Patent

Filed March 30, 2000

Application No. 09/539,482

FOR:

METHODS FOR EFFICIENT HOST PROCESSING OF DATA FILES SELECTED FOR RECORDING TO AN OPTICAL DISC MEDIA

APPEAL BRIEF

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Appeal Brief Patents, Commissioner for Patents, P.O. Box 1450, Alexandria, VA, 22313-1450, on April 26, 2004.

Signed: _____
Neely J. Entwistle

MARTINE & PENILLA, LLP
Attorneys for Applicant

TABLE OF CONTENTS

Page No.

I. REAL PARTY IN INTEREST

The real party in interest is Roxio, Inc., the assignee of the present application.

II. RELATED APPEALS AND INTERFERENCES

The undersigned is not aware of any related appeals and/or interferences.

III. STATUS OF THE CLAIMS

A total of 26 claims were presented during the prosecution of the present application. Applicant canceled claims 4 and 22. Applicant appeals the final rejection of claims 1-3, 5-21, and 23-26.

IV. STATUS OF THE AMENDMENTS

A Request for Continued Examination was filed on June 6, 2003. An Amendment was filed on September 18, 2003. Claims 1-3, 5-21, and 23-26 were finally rejected on December 24, 2003. No Amendment has been filed subsequent to Final Rejection.

V. SUMMARY OF THE INVENTION

The subject application is directed towards methods for recording data files to optical media. More specifically, the subject application provides methods for preparation and processing, by a host, those data files that have been selected for recording to optical media. Methods provided in the present application have been illustrated with the selection and recording of data files to a CD optical media, but it should be understood that the presently claimed invention can be implemented in numerous ways, including as a process, an apparatus, a system, a device, a method, or a computer readable media.

Data files selected for recording to optical media are typically selected from such disparate locations as a host system hard drive, other removable media such as other optical media, tape, disk, etc., or from network or Internet locations. Typically, processing by the host system of those files selected for recording to optical media, also referred to as writing to optical media, involved the generation and compilation of numerous lists and other data structures that are created, verified, sequenced, unpacked, passed through various system components to the CD recording engine, re-assembled, etc., prior to recording to the target or destination optical media (see

Applicant's specification as filed, pages 2-4). In the presently claimed invention, the host processing operations are optimized to obtain an efficient and economical process that minimizes the number of lists and other structures created to maximize the efficient utilization of host system resources to record selected data files to optical media.

In the present invention, a host system generates a record data structure for each of the data files selected for recording to optical media. A record data structure is a data structure containing a record of identifying information about a file selected for recording to enable the writing of the file to the destination optical media (page 9, lines 11-15). Data fields in the record data structure include such information about the data file to be recorded as the file parent, the volume label index, the file size, the logical block number, the file time, the file source path, file attributes, data mode, whether or not the file is on removable media, any embedded subheader that may exist, and whether or not the file is imported (page 9, line 16-page 11, line 5, Fig. 2B).

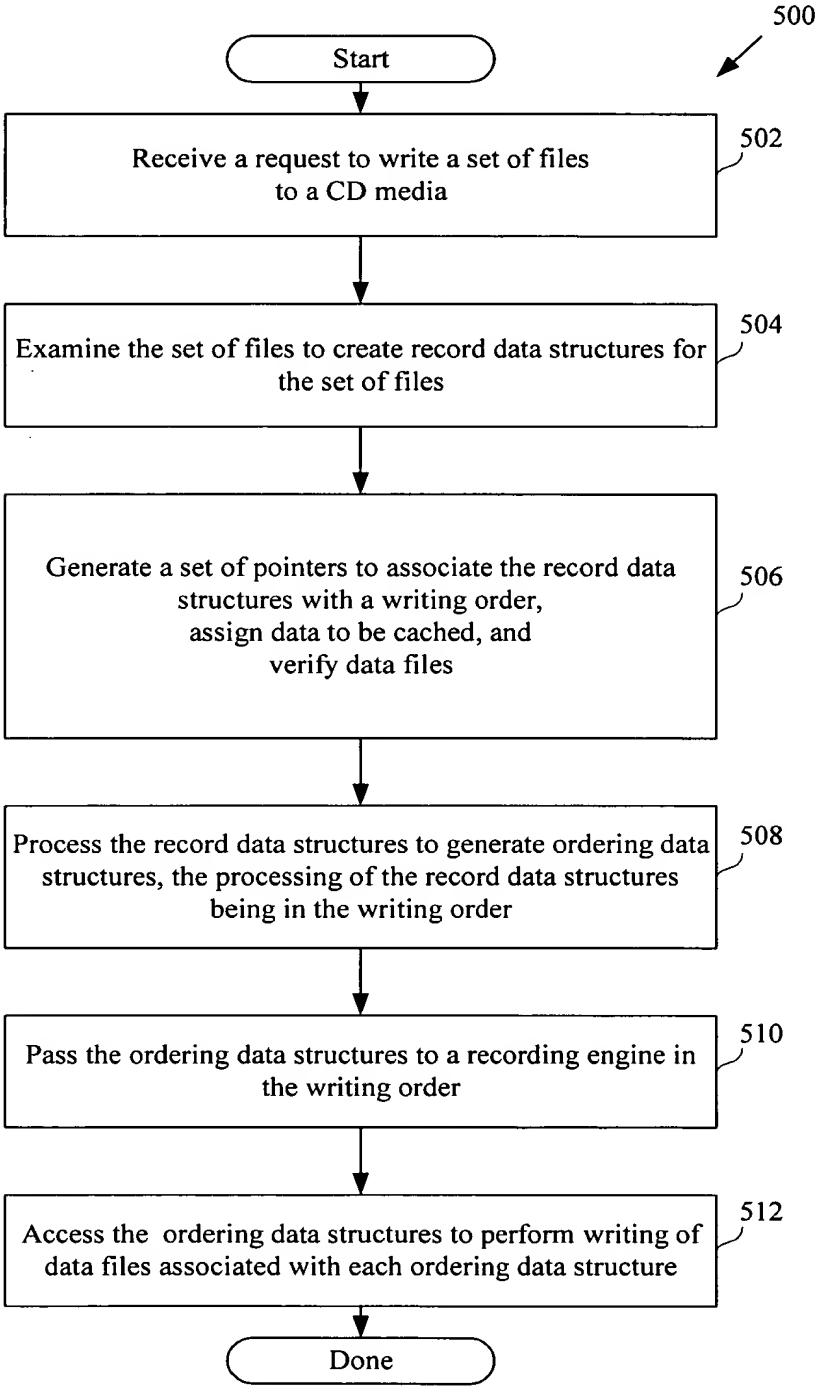
A dynamic file ordering of the record data structures is accomplished by use of pointers. Pointers, used to sequence the files to be written to the destination optical media, require a minimum of system resources, and identify the files in a source location or in a location in system cache where those files that will be cached for the writing operation, in the writing order (page 11, line 23-page 12, line 11).

The present invention then processes the dynamically ordered record data structures to generate an ordering data structure for each file. An ordering data structure is a data structure that will be passed to the CD recording engine, and one ordering data structure is generated for each file to be recorded. An ordering data structure is a record of pointers to the source data file, generated in the order in which the selected files will be written to the destination optical media, and include pointers for fields including a file source path, a file start offset, a file end offset, and a file pad to size. This minimum sized data structure is created by the host system for each file to be recorded, and in the recording order the selected files will be written to the destination optical media (page 12, line 19-page 14, line 8).

The ordering data structures are passed in the order in which the files will be written to the destination optical media, the writing order, to the CD recording engine. Final processing in the CD recording engine includes the processing of the ordering data structures, in the writing order, by following the pointers of the ordering data structures, the reading of the data files from the source or from system cache into the

CD recording circuitry which then writes the files onto the destination optical media (page 14, lines 9-15).

The following flowchart diagram, Applicant's Fig. 5, is provided to outline the method operations of one embodiment of the present invention, as summarized above.



VI. ISSUES

The issues presented in this Appeal are whether the rejections under 35 U.S.C. §102(b) of the claims under appeal are proper.

VII. GROUPING OF CLAIMS

For purposes of this Appeal only, Applicant proposes a single group of claims. The claims within the group will stand or fall together. The group includes claims 1-3, 5-21, and 23-26.

VIII. ARGUMENTS

A. Claims 1-3, 5-21, and 23-26 are not anticipated by Takeda et al.

Claims 1-3, 5-21, and 23-26 stand rejected under 35 U.S.C. §102(b) as being anticipated by Takeda et al. (U.S. Patent No. 4,760,526).

The patent to Takeda et al. teaches a method of data retrieval in a device such as an optical media (*i.e.*, a CD-R, or other write once media) that contains a plurality of data records or files and is incapable of physical rewriting or updating (col. 1, lines 58-61). Takeda et al. teach reading all index data from the media, sorting the data, and writing the data to rewritable media such as main memory or magnetic disk permitting high speed read/write operations. The index data is written in the form of an index look-up table (col. 1, line 68-col. 2, line 1). The index look-up table includes pointers to corresponding files on the optical media to facilitate access to a corresponding file identified in the look-up table. The patent further teaches a method of adding files or records to the data records, and updating an order or sequence of the data records.

In order for a reference to anticipate a claim, ***each and every element as set forth in the claim*** must be found in the reference, either expressly or inherently described. MPEP 2131. The fact that words or phrases may be common to the reference and a claim is not enough. Each and every element must be found, and each and every element must be found as set forth in the claim. Applicant respectfully submits that Takeda et al. does not anticipate Applicant's independent claims 1, 9, or 19, and therefore also fails to anticipate Applicant's dependent claims 2-3, 5-8, 10-18,

20-21, or 23-26, each of which depends, directly or indirectly, from one of independent claims 1, 9, and 19.

In independent claim 1 of the presently claimed invention, Applicant claims a method for processing data to be recorded on an optical disc. The method includes examining a set of files selected to be recorded on the optical disc, and creating a record data structure for each file in the set of files to be recorded on the optical disc. Then, a set of pointers is generated to associate the record data structures with a writing order. The set of pointers defines a dynamically sequenced list of record data structures. The method next provides for processing each of the record data structures one after another in the writing order according to the dynamically sequenced list of record data structures. The processing of the record data structures produces ordering data structures for each file in the set of files. The ordering data structures are a record of pointers to a source data file, with each file in the set of files having a corresponding ordering data structure. The method then provides for processing the ordering data structures to write the set of files onto the optical disc in the writing order. The source data file is defined as a data file in the set of files at a source location from which it is read to be recorded on the optical disc.

In independent claim 9, Applicant claims a method for recording data onto an optical disc. The method provides for generating a set of pointers to associate record data structures with a writing order. The set of pointers defines a dynamically ordered list of record data structures. The method also includes processing each of the record data structures one after another in the writing order to produce an ordering data structure for each file in a set of files to be recorded onto the optical disc. Each ordering data structure is a record of pointers to a source of data for recording onto the optical disc. Next, the method provides for processing each ordering data structure to write the set of files onto the optical disc in the writing order defined by the dynamically ordered list of record data structures.

In independent claim 19, Applicant claims a computer readable media having program instructions for recording data onto an optical disc. The computer readable media includes program instructions for examining a set of files selected to be recorded on the optical disc, and for creating a record data structure for each file in the set of files to be recorded on the optical disc. The computer readable media further includes program instructions for generating a set of pointers to associate record data structures with a writing order. The set of pointers defines a dynamically

sequenced list of record data structures, and the writing order is a sequence in which each file in the set of files is to be recorded onto the optical disc. Additionally, the computer readable media includes program instructions for processing each of the record data structures, one after another and in the in the writing order according to the dynamically sequenced list to produce an ordering data structure for each file in a set of files The ordering data structure has a pointer to a source location of a corresponding data file. Finally, the computer readable media includes program instructions for processing each ordering data structure to write the set of files onto the optical disc in the writing order.

Although the Examiner provided only vague citations (*e.g.,* in the rejection of claim 1, the rejections for each feature or element is supported by identical citations to entire sections of text having little or no relevance to the rejected feature), Applicant provides the following analysis of specific features.

Turning first to Applicant's claim 1, Applicant claims the examining of a set of files selected to be recorded to the optical disc. The reference patent teaches "to speed data retrieval in a file device which uses a record medium such as an optical disk which is incapable of physical rewriting or updating of recorded data" (col. 1, lines 58-61). The reference patent teaches the indexing and retrieval of data already recorded to some non-rewritable media, such as an optical media. Applicant is claiming a method for processing data to be recorded to an optical disc. In the very first feature, Applicant claims examining a set of files to be recorded on the optical disc. The reference patent does not teach recording to optical media, and therefore does not teach examining a set of files to be recorded on the optical media.

Also in claim 1, Applicant claims creating a record data structure for each file in the set of files to be recorded on the optical disc. Again, the reference does not teach recording files to optical media, and therefore teaches no method operations related to "each file in the set of files to be recorded to the optical disc." Further, the patent to Takeda et al. do not teach or suggest a record data structure. Since Examiner has failed to specify what in the lengthy citations the Office might consider to be a "record data structure," Applicant turns first to his own specification in which he defines a record data structure as "a record of identifying information about one of the data files selected to be recorded to a CD that will enable the writing of the source data file to a destination CD" (Applicant's Specification as filed, page 9, lines 11-15). A record data structure is therefore a data structure containing identifying information

about a file selected to be recorded to optical media. Applicant illustrates an exemplary record data structure in Figure 2B, and describes various data fields at page 9, line 16-page 11, line 5. The patent to Takeda et al. does not teach recording files to optical media, and does not teach the creation of a record data structure for each file selected to be recorded to an optical disc. Takeda et al. do teach the creation of tables from the index data of the data records on a non-rewritable media, and ordering the data records in the tables created, but Takeda et al. do not teach the recording of data to an optical media, and do not teach the creation of data structures, specifically a record data structure, that is created by a host system to enable the locating, access, verification, and ultimately the writing of the selected files to an optical media.

Next, Applicant claims generating a set of pointers to associate the record data structures with a writing order, the set of pointers defining a dynamically sequenced list of record data structures. While it is true that Takeda et al. teach the use of pointers (*e.g.*, col. 2, lines 5-7), the pointers are used in the index of record data to rapidly and efficiently access the corresponding actual record or file. Further, Takeda et al. do teach a sequencing of the index of records to search for records by, for example, date or title (see col. 5, lines 9-29, 41-66, and Figures 12A-12C). However, the reference does not teach the set of pointers defining a dynamically sequenced list of record data structures.

Applicant also claims processing each of the record data structures one after another in the writing order according to the dynamically sequenced list of record data structures to produce ordering data structures for each file in the set of files, the ordering data structures being a record of pointers to a source data file with each file in the set of files having a corresponding ordering data structure. The final rejection fails to provide reasonably specific citations, and the Office has failed to support the rejection. Takeda et al. simply fail to teach or suggest processing of record data structures. Takeda et al. fail to teach or suggest record data structures at all. Takeda et al. also fail to teach or suggest processing of the record data structures in a writing order. Takeda et al. do not teach writing to an optical media. Takeda et al. fail to teach the producing of ordering data structures. As Applicant describes at page 13, line 10-page 14, line 8, and illustrates in Figure 3, an ordering data structure "is a record of pointers to a source data file." Again, Applicant has defined and claimed a data structure. The ordering data structure is a record of pointers to a source data file that is processed in the writing order by the CD Recording Engine to write the

selected files to an optical media. Takeda et al. do not teach recording files to an optical media, do not teach creating or processing data structures of any kind, and certainly do not teach or suggest a record data structure or an ordering data structure, their creation, or their processing.

Applicant further claims processing the ordering data structures to write the set of files onto the optical disc in the writing order. Takeda et al. do not teach writing files to an optical media. Takeda et al. do not teach ordering data structures. Takeda et al. do not teach processing the ordering data structure to write the set of files onto the optical disc in the writing order.

Finally, in independent claim 1, Applicant claims a specific definition of a source data file as a data file in the set of files at a source location from which it is read to be recorded on the optical disc. Takeda et al. do not teach recording to optical media. Takeda et al. do not teach reading a source file from a source location to be recorded to the optical disc. At most, Takeda et al. teach reading a file that has already been recorded to a non-rewritable optical disk, but that is not what Applicant has claimed.

Turning now to Applicant's independent claim 9, Applicant has claimed a method for recording data onto an optical disc. Interestingly, the Office has provided the identical, non-specific, large sections of text citations in support of the rejection without providing a hint or clue as to what has been considered as corresponding method operations or defined structures. Looking to each feature in Applicant's independent claim 9, Applicant respectfully submits that the Office has failed to establish or support a case that Takeda et al. anticipate the claim.

Applicant claims generating a set of pointers to associate record data structures with a writing order, the set of pointers defining a dynamically ordered list of record data structures. As described above in reference to independent claim 1, Takeda et al. do not teach the writing of data files to optical media. Takeda et al. do teach the use of pointers to rapidly and efficiently access data records already recorded to a non-rewritable optical disk, but Takeda et al. do not teach record data structures, or any other data structures, and do not teach defining a dynamically ordered list of record data structures with a generated list of pointers. Takeda et al. further do not teach generating a set of pointers to associate record data structures with a writing order. Takeda et al. are not writing files to an optical media, but rather

are indexing files, or images of files, that are already recorded to a non-rewritable media such as an optical disk. There is no writing order.

Next, Applicants claim processing each of the record data structures one after another in the writing order to produce an ordering data structure for each file in a set of files to be recorded onto the optical disc. Each ordering data structure is a record of pointers to a source of data for recording onto the optical disc. Takeda et al. do not teach a record data structure, and therefore do not teach the processing of a record data structure for any purpose. Takeda et al. do not teach the writing of data to an optical media, and do not teach a writing order. Takeda et al. do not teach an ordering data structure. Takeda et al. do teach the use of pointers, but their pointers do not point to a source of data for recording to the optical disc.

Finally, Applicant claims the processing of each ordering data structure to write the set of files onto the optical disc in the writing order defined by the dynamically ordered list of record data structures. Again, Takeda et al. do not teach the writing of data to an optical media. Takeda et al. do not teach ordering data structures, or the processing of ordering data structures to write files to an optical media. Takeda et al. do not teach writing files to an optical media, and do not teach a writing order defined by the dynamically ordered list of record data structures.

Finally, in independent claim 19, Applicant claims a computer readable media having program instructions for recording data onto an optical media. The computer readable media taught by Takeda et al. is a "record medium such as an optical disk which is incapable of physical rewriting or updating of recorded data" (col. 1, lines 59-61) on which data records have been written. The media is incapable of physical rewriting or updating of recorded data, and therefore is not teaching the recording of data to an optical media.

The claimed computer readable media includes a plurality of program instructions that define the features of Applicant's independent claim 19. These program instructions include instructions for examining a set of files selected to be recorded on the optical disc, creating a record data structure for each file in the set of files to be recorded on the optical disc, generating a set of pointers to associate record data structures with a writing order, processing each of the record data structures one after another in the writing order according to the dynamically sequenced list to produce an ordering data structure for each file in a set of files, and processing each ordering data structure to write the set of files onto the optical disc in the writing

order. Applicant has further defined the set of pointers as defining a dynamically sequenced list of record data structures, and the writing order as being a sequence in which each file in the set of files is to be recorded onto the optical disc. Additionally, the ordering data structure is defined as having a pointer to a source location of a corresponding data file. With the possible exception of pointers, and then only in the abstract, the reference patent fails to teach any of Applicant's claimed features in independent claim 19. Each specific feature has been addressed elsewhere in this Appeal.

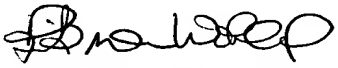
B. Conclusion

For the foregoing reasons, the rejections of claims 1-3, 5-21, or 23-26, under 35 U.S.C. §102(b) are improper and should be reversed. Applicant has claimed a method and computer readable media for recording data to optical media. In the **Background** of Applicant's specification as filed, Applicant identified a number of problems, redundancies, and resource management issues that is a hallmark of the prior art. Applicant defined, illustrated, and claimed a process for recording data to optical media utilizing novel and minimal data structures and data processing to record the selected data.

In finally rejecting the pending claims, the Office failed to cite with reasonable specificity the structures, methods, or text in the reference patent to enable meaningful analysis and answer by Applicant. In the present Appeal, Applicant is tasked, in part, with "proving the negative." That is, without specific citations or identified corresponding structures, Applicant can describe what he has claimed, but then must prove the negative in the reference patent. The cited reference patent is perhaps in a *related* field since it does teach reading data *from* an optical media, but it does not teach methods, systems, or computer readable media for recording data to an optical media, it does not teach the host processing of the data selected to be recorded to the optical media, does not teach the data structures that are created and generated in the processing of data files to optical media, and actually has very little in common with the present application.

For at least the above reasons, Takeda et al. do not anticipate Applicant's independent claims 1, 9, or 19. Likewise, Takeda et al. do not teach each and every element of, and do not anticipate, Applicant dependent claims 2-3, 5-8, 10-18, 20-21, or 23-26, each of which depend directly or indirectly from one of independent claims 1, 9, or 19. Takeda et al. therefore do not anticipate claims 1-3, 5-21, or 23-26, and Applicant respectfully submits that the §102 rejections of the claims as being anticipated by Takeda et al. are in error, and request that the Board of Appeals and Interferences reverse the Examiner's rejections of the claims on appeal.

Respectfully submitted,
MARTINE & PENILLA, L.L.P.



Rick von Wohld, Esq.
Reg. No. 48,018

MARTINE & PENILLA, LLP
710 Lakeway Drive, Suite 170
Sunnyvale, California 94085
Customer Number 25920

APPENDIX

CLAIMS ON APPEAL

1. A method for processing data to be recorded on an optical disc, comprising:

examining a set of files selected to be recorded on the optical disc;

creating a record data structure for each file in the set of files to be recorded on the optical disc;

generating a set of pointers to associate the record data structures with a writing order, the set of pointers defining a dynamically sequenced list of record data structures;

processing each of the record data structures one after another in the writing order according to the dynamically sequenced list of record data structures to produce ordering data structures for each file in the set of files, the ordering data structures being a record of pointers to a source data file with each file in the set of files having a corresponding ordering data structure; and

processing the ordering data structures to write the set of files onto the optical disc in the writing order,

wherein the source data file is a data file in the set of files at a source location from which it is read to be recorded on the optical disc.

2. The method for processing data to be recorded on an optical disc of claim 1, wherein the record data structure includes one or more of a group of information strings comprising a file parent, a volume label index, a file size, a logical block number of a data file, a file path, a file attributes, a data mode, a removable media indicator, an embedded subheader string, and an imported file indicator.

3. The method for processing data to be recorded on an optical disc of claim 1, further comprising:

designating data files to be written to system cache memory;

assigning data files designated to be written to system cache memory to a specific location in system cache memory;

verifying that the record data structures accurately define each of the set of files.

4. Canceled.

5. The method for processing data to be recorded on an optical disc of claim 1, wherein the record of pointers to a source data file includes one or more of a group of information strings referencing source data files and including a file source path, a file start offset, a file end offset, and a file pad to size.

6. The method for processing data to be recorded on an optical disc of claim 1, wherein the processing of the ordering data structures includes passing the ordering data structures to a CD recording engine, the CD recording engine writing the set of files onto the optical disc in the writing order.

7. The method for processing data to be recorded on an optical disc of claim 1, further comprising:

receiving a request to write the set of files.

8. The method for processing data to be recorded on an optical disc of claim 1, wherein the method is executed by computer executing code that defines a file system database block.

9. A method for recording data onto an optical disc, comprising:

generating a set of pointers to associate record data structures with a writing order, the set of pointers defining a dynamically ordered list of record data structures;

processing each of the record data structures one after another in the writing order to produce an ordering data structure for each file in a set of files to be recorded onto the optical disc, each ordering data structure being a record of pointers to a source of data for recording onto the optical disc; and

processing each ordering data structure to write the set of files onto the optical disc in the writing order defined by the dynamically ordered list of record data structures.

10. A method for recording data onto an optical disc as recited in claim 9, further comprising:

examining ~~a~~ the set of files selected to be recorded onto the optical disc.

11. A method for recording data onto an optical disc as recited in claim 10, further comprising:

creating a record data structure for each file in the set of files to be recorded onto the optical disc.

12. A method for recording data onto an optical disc as recited in claim 11, wherein the record data structure includes one or more of a group of information strings comprising a file parent, a volume label index, a file size, a logical block number of a data file, a file path, a file attributes, a data mode, a removable media indicator, an embedded subheader string, and an imported file indicator.

13. A method for recording data onto an optical disc as recited in claim 11, further comprising:

designating data files to be written to system cache memory;

assigning data files designated to be written to system cache memory to a specific location in system cache memory;

verifying that the record data structures accurately define each of the set of files.

14. A method for recording data onto an optical disc as recited in claim 11, wherein each ordering data structure includes a pointer to a corresponding source file.

15. A method for recording data onto an optical disc as recited in claim 14, wherein the pointer includes at least one a group of information strings referencing the corresponding source file and including a file source path, a file start offset, a file end offset, and a file pad to size.

16. A method for recording data onto an optical disc as recited in claim 11, wherein the processing of the ordering data structures includes passing the ordering

data structures to a CD recording engine, the CD recording engine writing the set of files onto the optical disc in the writing order.

17. A method for recording data onto an optical disc as recited in claim 11, further comprising:

receiving a request to write the set of files.

18. A method for recording data onto an optical disc as recited in claim 11, wherein the method is executed by computer executing code that defines a file system database block.

19. A computer readable media having program instructions for recording data onto an optical disc, the computer readable media comprising:

program instructions for examining a set of files selected to be recorded on the optical disc;

program instructions for creating a record data structure for each file in the set of files to be recorded on the optical disc;

program instructions for generating a set of pointers to associate record data structures with a writing order, the set of pointers defining a dynamically sequenced list of record data structures and the writing order being a sequence in which each file in the set of files is to be recorded onto the optical disc;

program instructions for processing each of the record data structures one after another in the writing order according to the dynamically sequenced list to produce an ordering data structure for each file in a set of files, the ordering data structure having a pointer to a source location of a corresponding data file; and

program instructions for processing each ordering data structure to write the set of files onto the optical disc in the writing order.

20. A computer readable media having program instructions for recording data onto an optical disc as recited in claim 19, wherein the record data structure includes one or more of a group of information strings comprising a file parent, a volume label index, a file size, a logical block number of a data file, a file path, a file attributes, a data mode, a removable media indicator, an embedded subheader string, and an imported file indicator.

21. A computer readable media having program instructions for recording data onto an optical disc as recited in claim 19, further comprising:

program instructions for designating data files to be written to system cache memory;

program instructions for assigning data files designated to be written to system cache memory to a specific location in system cache memory;

program instructions for verifying that the record data structures accurately define each file in the set of files.

22. Canceled

23. A computer readable media having program instructions for recording data onto an optical disc as recited in claim 19, wherein the pointer to the source location includes one or more of a group of information strings referencing the

corresponding data file and including a file source path, a file start offset, a file end offset, and a file pad to size.

24. A computer readable media having program instructions for recording data onto an optical disc as recited in claim 19, wherein the processing of each ordering data structure includes program instructions for passing the ordering data structure to a CD recording engine, the CD recording engine writing the set of files onto the optical disc in the writing order.

25. A computer readable media having program instructions for recording data onto an optical disc as recited in claim 19, further comprising:

program instructions for receiving a request to write the set of files.

26. A computer readable media having program instructions for recording data onto an optical disc as recited in claim 19, further comprising:

program instructions for defining a file system database block.